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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S REVISED ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS REPLY IN SUPPORT  
OF ITS MOTION FOR A PRELIMINARY  
INJUNCTION, SUPPORTING  
DECLARATIONS, AND SUPPORTING  
EXHIBITS THERETO, AND CERTAIN  
ADDITIONAL DOCUMENTS AS  
REQUESTED BY THE COURT**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Revised Administrative Motion to File Under Seal Portions of Its Reply in Support of Its Motion for a Preliminary Injunction, Supporting Declarations, and Supporting Exhibits Thereto, and Certain Additional Documents as Requested by the Court, filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Original Docket Entry	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply in Support of Motion for a Preliminary Injunction	Originally filed at Dkt. 245-3; revised at Dkt. 342-1	Highlighted Portions	Waymo (yellow highlighting); Defendants (blue highlighting)
Exhibit 64 to the Declaration of Jordan Jaffe (“Jaffe Decl.”) <sup>1</sup>	Dkt. 246-3	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Exhibits 65-66, 68, 83-84, 90, & 91 to the Jaffe Decl.	Originally filed at Dkt. 246-247; revised at Dkt. 342	Green Highlighted Portions	Waymo
Exhibits 85, 87, 101 and 107 to the Jaffe Decl.	Dkt. 246-247; revised at Dkt. 342.	Entire Documents	Waymo
Exhibits 61-63, 67, and 82 to the Jaffe Decl.	Originally filed at Dkt. 246-247; revised at Dkt. 272	Blue Highlighted Portions	Defendants
Exhibits 69, 70-78, 85, 86, 87, 92-100, 101, 104-106, 107, 109-110 to the Jaffe Decl.	Dkt. 246-247	Entire Documents	Defendants
Declaration of Gregory Kintz (“Kintz Decl.”)	Originally filed at Dkt. 245-5;	Highlighted Portions	Waymo (green highlighting);

<sup>1</sup> In connection with this revised administrative motion, Waymo is including certain pages that were previously inadvertently omitted from Jaffe Decl. Exs. 64, 83, 89 and 90.

Document	Original Docket Entry	Portions to Be Filed Under Seal	Designating Party
	revised at Dkt. 342-3		Defendants (blue highlighting)
Exhibits 114-127 and 131 to the Supplemental Declaration of Jordan Jaffe, filed concurrently herewith.	N/A	Entire Documents	Defendants

3. Specifically, Waymo's Reply in Support of Motion for Preliminary Injunction, declarations in support thereof, and exhibits thereto (collectively "PI Reply") contain or refer to trade secret and confidential business information, which Waymo seeks to seal.

4. Waymo's PI Reply (portions highlighted in yellow), Exhibits 64-66, 68, 83-84, 90 & 91 (portions highlighted in green), Exhibits 85, 87, 101, & 107, and the Kintz Decl. (portions highlighted in green) each contain, reference, and/or describe Waymo's asserted trade secrets. The information Waymo seeks to seal includes the confidential design and functionality of Waymo's proprietary autonomous vehicle system, which Waymo maintains as secret. This information also contains Uber documents that reflect Waymo's misappropriated trade secrets. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to in-depth descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

5. Waymo's request to seal is narrowly tailored to those portions of the PI Motion and supporting exhibits that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on May 8, 2017.

4 By /s/ Lindsay Cooper  
5 Lindsay Cooper  
6 Attorneys for WAYMO LLC  
7

8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
10 filing of this document has been obtained from Lindsay Cooper.

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12 /s/ Charles K. Verhoeven  
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